

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE APPLICATION :
OF THE UNITED STATES OF AMERICA :
FOR A SEARCH OF CERTAIN PREMISES : 1:21MJ429-1
IN GREENSBORO, NORTH CAROLINA :

MOTION TO SEAL

NOW COMES the United States of America, by Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, through her assistant, Terry M. Meinecke, and respectfully moves this Honorable Court, to seal the supplement to this motion and search warrant materials, including the affidavit and application in the above-referenced matter. The caption for the search warrant in 1:21MJ429, which included a residential address, has been altered in this document in order to protect the ongoing investigation. Such sealing is within the inherent power of the court to control papers filed with it. Baltimore Sun Co. v. Goetz, 886 F.2d 60, 64 (4th Cir. 1989). In support whereof, the government shows unto the court the following:

- (1) This investigation is a continuing one, with information and data being derived from numerous sources.
- (2) Disclosure of the information being utilized during the course of the investigation may hamper the conclusion of the investigation.

(3) The information contained within the affidavit for search warrant and other related search warrant materials would make patent the sources of information presently available to the investigation.

WHEREFORE, the government respectfully moves that this Honorable Court seal the supplement to this motion, the related search warrant materials, and modify the case caption as reflected above until such time as the investigation is concluded.

This the 8th day of December, 2021.

Respectfully submitted,

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